

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS AMERICA  
MARKETING FSI L.L.C., and NEWS  
AMERICA MARKETING IN-STORE  
SERVICES L.L.C.,

Defendants.

Case No.: 19-cv-1820 MJD/BRT

**JURY TRIAL DEMANDED**

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Plaintiff Insignia Systems, Inc., through its attorneys, moves the Court to compel Defendants News Corporation, News America Marketing FSI L.L.C., and News America Marketing In-Store Services L.L.C. to produce the deposition transcripts and exhibits of 19 of Defendants' witnesses who were deposed in *Valassis Communications, Inc. v. News Corp., et al.*, No. 17-cv-7378 (PKC) (S.D.N.Y.) ("*Valassis*"); the deposition transcripts of Defendants' witnesses who were deposed in prior cases and whose deposition materials were reproduced in *Valassis*; documents designated as trial and summary judgment exhibits in *Valassis* that hit on search terms negotiated in this case, with the exception of third-party documents so designated; and documents related to Defendant News Corporation's sale of Defendants News America Marketing to Charlesbank Capital Partners. Insignia bases this motion on all of the files, records, and proceedings of this

action, and the briefing and supporting materials, which will be filed and served in accordance with the Federal Rules of Civil Procedure and Rule 7.1 of the Local Rules.

Dated: September 8, 2020

Respectfully submitted,

/s/ Y. Gloria Park

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